

BENJAMIN HILLARD (*Pro Hac Vice*)  
HILLARD CUYKENDALL & ALLRED, P.A.  
13143 66<sup>th</sup> Street  
Largo, Florida 33773  
Tel: (727) 536-8882  
Fax: (727) 536-7739  
Ben.Hillard@gmail.com  
HCAEService@gmail.com

JEFFREY P. POSNER (0022075)  
JEFFREY P. POSNER LLC  
3393 Norwood Rd,  
Shaker Heights, OH 44122  
Tel: (216) 752-7504  
Fax: (216) 752-8226  
JPosnerLaw@SBCGlobal.net

*Attorneys for Defendant The Marketing Source, Inc.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO-EASTERN DIVISION**

ANTHONY REO; AND BRYAN REO,	)	
	)	
Plaintiffs,	)	Case No. Case No. 1:14-cv-01374-DCN
	)	Honorable Donald. C. Nugent
vs.	)	
	)	
CARIBBEAN CRUISE LINE, INC.; THE	)	<b>MOTION FOR ADMISSION PRO</b>
MARKETING SOURCE, INC; AND, GULF	)	<b>HAC VICE</b>
COAST PROCESSING AND TRAVEL, INC.,	)	
	)	
Defendants.	)	
	)	

Benjamin Hillard, Esq. of Hillard Cuykendall & Allred, P.A. moves this Court for an Order granting admission *pro hac vice* for the purpose of appearing as counsel on behalf of THE MARKETING SOURCE, INC. in the above-style cause only. In support of this Motion and pursuant to Local Rule of Civil Procedure 83.5(h), applicant states:

1           1.     A Certificate of Good Standing from the Florida Bar accompanies this Motion as  
2 **Exhibit A.**

3           2.     Pertinent information of applicant is as follows:

4                   Name:                   Benjamin Hillard  
5                   Address:               Hillard Cuykendall & Allred, P.A.  
6                                       13143 66<sup>th</sup> St. N.  
                                      Largo, FL 33773  
7                   Telephone:           (727) 536-8882  
                                      Facsimile:           (727) 536-7739  
8                   Service email:       HCAEservice@gmail.com  
                                      Highest Court Admitted: Florida Supreme Court  
9                   Admission date:     September 16, 2004  
10                  Florida Bar number: 764361

11           3.     Appellant has never been disbarred or suspended from practicing before any  
12 court, department, bureau, or commission of any State or the United States, nor has applicant  
13 received any reprimand from any such court, department, bureau, or commission pertaining to  
14 conduct or fitness as a member of the bar.

15           4.     Contemporaneous with filing this Motion, applicant has submitted a *pro hac vice*  
16 fee to the Clerk of U.S. District Court in the amount prescribed in Local Rule 83.5(h).  
17

18           **WHEREFORE**, the applicant requests this Court enter an order of admission *pro hac*  
19 *vice* for purposes of this cause only.  
20

21           Dated: November 10, 2015                   HILLARD CUYKENDALL & ALLRED, P.A.

22                   By: /s/ Benjamin Hillard  
23 Benjamin Hillard, Esq.           FBN 764361  
24 Amy E. Cuykendall, Esq.       FBN 010347  
25 Alexander R. Allred, Esq.       FBN 100892  
26 13143 66<sup>th</sup> Street North, Largo, FL 33773  
27 Phone: (727) 536-8882 / Fax: (727) 536-7739  
28 Service Only: HCAEservice@gmail.com  
Attorneys for The Marketing Source, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 10th<sup>th</sup> day of November 2015, I electronically filed the foregoing utilizing the Court's CM/ECF system, which will send notification to the parties of counsel indicated as follows:

Abbas Kazerounian, Esq.

[ak@kazlg.com](mailto:ak@kazlg.com)

Matthew M. Loker, Esq.

[ml@kazlg.com](mailto:ml@kazlg.com)

KAZEROUNI LAW GROUP, APC

245 Fischer Avenue

Costa Mesa, CA 92626

Tel: (800) 400-6808 x 5

Fax: (800) 520-5523

Joshua B. Swigart, Esq.

[josh@westcoastlitigation.com](mailto:josh@westcoastlitigation.com)

HYDE & SWIGART

2221 Camino Del Rio South, Suite 101

San Diego, CA 92108

Tel: (619) 233-7770

Fax: (619) 297-1022

Todd M. Friedman, Esq.

[tfriedman@attorneysforconsumers.com](mailto:tfriedman@attorneysforconsumers.com)

LAW OFFICES OF TODD M.

FRIEDMAN, P.C.

369 S. Doheny Dr., Suite 415

Beverly Hills, CA 90211

Tel: (877) 206-4741

Fax: (866) 633-0228

RICHARD W. EPSTEIN (*Pro Hac Vice*)

JEFFREY A. BACKMAN (*Pro Hac Vice*)

GREENSPOON MARDER, P.A.

200 East Broward Boulevard, Suite 1800

Fort Lauderdale, Florida 33301

Tel: (954) 491-1120

Fax: (954) 343-6958

[richard.epstein@gmlaw.com](mailto:richard.epstein@gmlaw.com)

[jeffrey.backman@gmlaw.com](mailto:jeffrey.backman@gmlaw.com)

/s/ Benjamin Hillard

BENJAMIN HILLARD Esq.





# The Florida Bar

JOHN F. HARKNESS, JR.  
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET  
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600  
WWW.FLORIDABAR.ORG

State of Florida            )

County of Leon            )

In Re:       764361  
              Benjamin Earl Hillard  
              13143 66th St.  
              Largo, FL

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on September 16, 2004.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is an active member of The Florida Bar in good standing.

Dated this 4th day of November, 2015.

Pam Gerard, Manager  
Membership Records Dept.  
The Florida Bar

PG/MW:kstu1:R10

